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December 20, 2004

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Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-B204  
Washington, DC 20554

RE: Comment on American Teleservices Association, Inc.'s Petition for Declaratory Ruling and New Jersey Attorney General Peter Harvey's Motion to Dismiss Petition of American Teleservices Association, Inc. Regarding Certain Provisions of the New Jersey Consumer Fraud Act and New Jersey Administrative Code. CG Docket No. 02-278.

Dear Ms. Dortch:

We, the undersigned Attorneys General, hereby express our agreement with and support of the rationale and arguments in the Motion by the New Jersey Attorney General, pursuant to 47 C.F.R. §1.41, To Dismiss Petition of the American Teleservices Association, Inc. on Grounds of Sovereign Immunity and Lack of Jurisdiction, which was filed with the Commission on November 10, 2004, and the Comments of the Attorney General of the State of New Jersey in the Matter of American Teleservices Association, Inc.'s Petition for Declaratory Ruling with Respect to Certain Provisions of the New Jersey Consumer Fraud Act and the New Jersey Administrative Code, which were filed with the Commission on November 17, 2004. We urge the Commission to adopt the reasoning and conclusions expressed therein.

Sincerely,



Gregg Renkes  
Attorney General of Alaska



Terry Goddard  
Attorney General of Arizona



Mike Beebe  
Attorney General of Arkansas



Richard Blumenthal  
Attorney General of Connecticut



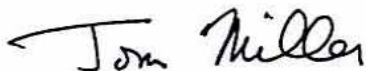
Robert J. Spagnoletti  
Attorney General of the District of Columbia<sup>1</sup>



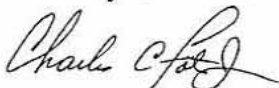
Mark J. Bennett  
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Lisa Madigan  
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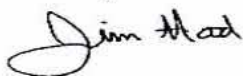
Tom Miller  
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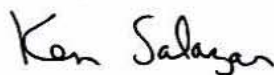
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Attorney General of Mississippi



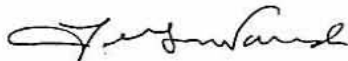
Ken Salazar  
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M. Jane Brady  
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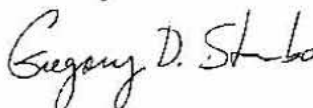
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Attorney General of Kentucky



Steven Rowe  
Attorney General of Maine



Tom Reilly  
Attorney General of Massachusetts

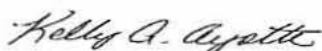


Jay Nixon  
Attorney General of Missouri

<sup>1</sup> The District of Columbia joins only with respect to the arguments made on lack of jurisdiction and takes no position on the question of sovereign immunity.



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Hardy Myers  
Attorney General of Oregon



Patrick C. Lynch  
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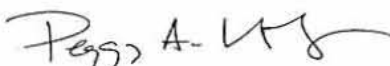
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